REMARKS

Reconsideration and allowance of this application are respectfully requested. Claims 1-25, 27-33, 43-45, and 47 remain pending. By this communication, claims 1, 7, 21, and 43 are amended, and claim 47 is added.

Allowable Subject Matter

Applicants acknowledge with appreciation the indication that independent claims 10, 13, 28, and 30, and their dependent claims are allowable.

Rejections Under 35 U.S.C. § 103

Claims 1-8, 14-17, 19-27, 31-33, and 43-45 – Gu

Claims 1-8, 14-17, 19-27, 31-33, and 43-45 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Gu* (U.S. Patent No. 5,874,988). Applicants respectfully traverse this rejection.

Gu discloses a system and method for automated color correction. Video parameters of a target image are iteratively adjusted until they match the corresponding video parameters of a selected reference. *Gu*, col. 20, lines 24-27 and Figure 8. The system provides a sequence of correction value signals to the image source to cause the video parameters of the target image to be adjusted. *Id.*, col. 20, lines 28-34. The system allows for automated determination of video parameter correction values, GAIN, GAMMA, and BLACK for red, green, and blue channels, and application of these correction values to one or more source images. *Id.*, col. 20, lines 40-44.

At decision block 815 in Figure 8 of *Gu*, an inquiry is made as to whether the video parameter values of the target image match the corresponding parameter

values of the reference image within a predetermined error margin. *Id.*, col. 21, lines 14-17. If the values do not match, the "no" branch is taken to adjust the GAIN, GAMMA, and BLACK levels. *Id.*, col. 21, lines 17-19. The difference between the respective values for GAIN, GAMMA, and BLACK for each of the red, green, and blue channels are computed, the computed difference is examined to ensure that the difference is within an expected range of values, and a predetermined adjustment value that is provided as a correction value signal is determined. *Id.*, col. 21, lines 21-27. On the other hand, if the values match, the "yes" branch is taken, in which the adjustment value is provided and saved as the correction values. *Id.*, col. 22, lines 7-9.

As described in the instant application, input image color characteristic data is input into the image color characteristic mapping unit, and then, the image color characteristic mapping unit receives color preference data having a reference value being equal to or approximating the input image color characteristic value from the color preference data unit (*See,* Specification, pg. 23, lines 29-33 and Figure 7). If a contents identifier is contained in the input image, the image color characteristic mapping unit may receive color preference data composed of a combination {preference value, reference value, image contents identifier} having the same contents identifier from the color preference data unit (*See,* Specification, pg. 23, line 33 to pg. 24, line3). As a result, the image color characteristic mapping unit determines and outputs a target color characteristic value using the input image color characteristic value and the color preference data (*See,* Specification, pg. 24, lines 4-6).

It is not possible to generate a target color characteristic value corresponding to user preference regardless of the type or contents of the images. However, it is possible to generate a target color characteristic value corresponding to user preference only for images included in a contents set by a contents identifier included in a combination {preference value, reference value, contents identifier}, for example, specified contents provided from MPEG-21, TV at anytime, or a contents service provider (*See* Specification, pg. 12, line 20 to pg. 13, line 3). Thus, it is possible to consider user preference for each type of contents by managing user preference data for respective contents by means of the contents identifier.

As discussed above, the contents identifier of the present application is used in the mapping of the color preference data to the input image color characteristic data to convert the input image so that the input image has the target color characteristic value. This mapping/correlation feature with the use of a contents identifier is not disclosed in *Gu*. *Gu*, rather, discloses a color correction method in which parameters of a target image are iteratively adjusted until they match the parameters of the selected reference. Accordingly, it cannot be fairly concluded that *Gu* discloses "a contents identifier that correlates the color characteristic value of the reference image with the color characteristic value of the preference image for generating a target color characteristic value" as recited in independent claims 1, 21, and 43.

Further, on page 9 of the Office Action, the Office states that a meta-data header and what is included in the header is a designer choice. As a result, Applicants respectfully contend that this statement is speculative, and request that the Office provide support for this reasoning. What is in the header is linked to the

signal processing sequences and methodologies Nowhere in *Gu* is there mentioned "meta-data." As such, Applicants' claimed embodiment has various capabilities and advantages over the concept described in *Gu*. For example, the data structure embodied in Applicants' claims can be represented with a data format such as XML and binary sequence. The data structure can be used to generate video that satisfies user preference in an image display having a variety of obtained color preferences, image display software, and a service system and apparatus for supplying video to a user via wire/wireless transmission (*See* Specification, pg. 26, lines 7-12). For at least these reasons, the use of meta-data as recited in Applicants' claims is more than mere design choice. Further, it is possible to generate an image corresponding to user preference in different image display devices by representing user preference data in the format of meta-data to be provided to a variety of image display devices.

Therefore, *Gu* does not disclose at least "***generating preference meta-data*** having at least one feature block for the pair {preference value, reference value}, wherein the feature block comprises: a block header including a feature identifier corresponding to information identifying a color characteristic; and at least one feature descriptor including the preference value and the reference value as values of the identified color characteristic for the preference image and the reference image, respectively, and *a contents identifier that correlates the color characteristic value of the reference image with the color characteristic value of the preference image for generating a target color characteristic value*" as recited in amended independent claim 1 and as similarly recited in independent claims 21 and 43.

Claims 2-8, 14-17, 19-20, 22-27, 31-33, and 44-45 are also distinguishable over *Gu* by virtue of their dependency on either independent claims 1, 21, or 43, and for the additional features recited therein. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection to independent claims 1, 21, and 43, and all claims dependent therefrom.

Claims 9 and 11 – Gu/Reuman

Claims 9 and 11 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Gu* in view of *Reuman* (U.S. Patent No. 6,063,982). Applicants respectfully traverse this rejection.

Applicants incorporate the discussion above and submit that *Gu* fails to disclose or suggest all of the features as recited in claim 1, the independent claim from which the rejected claims depend. Further, *Reuman* is not purported by the Office to overcome the noted deficiencies of *Gu*. Thus, it is respectfully requested that the rejection to claims 9 and 11 be withdrawn.

Claims 12 and 29 – Gu/Reuman/Pettigrew

Claims 12 and 29 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Gu* in view of *Reuman* and further in view of *Pettigrew et al.* (U.S. Patent Application No. 2001/0028736, hereinafter *Pettigrew*). Applicants respectfully traverse this rejection.

As discussed above, *Gu* or *Reuman*, alone or in combination, fails to disclose or suggest all of the features as recited in claims 1 and 21, the independent claims from which the rejected claims depend. Further, *Pettigrew* is not purported by the Office to overcome the noted deficiencies of *Gu* and *Reuman*. Thus, it is respectfully requested that the rejection to claims 12 and 29 be withdrawn.

Claim 18 – Gu

Claim 18 was rejected under 35 U.S.C. §103(a) as being unpatentable over

Gu. Applicants respectfully traverse this rejection.

As discussed above, *Gu* fails to disclose or suggest all of the features as

recited in claim 1, the independent claim from which rejected claim 18 depends.

Thus, it is respectfully requested that the rejection to claim 18 be withdrawn.
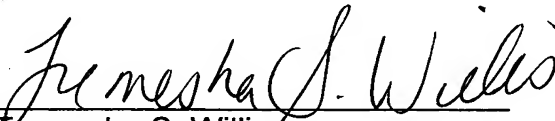
Conclusion

Based on at least the foregoing amendments and remarks, Applicants submit that claims 1-25, 27-33, 43-45, and 47 are allowable, and that this application is in condition for allowance. Accordingly, Applicants request a favorable examination and consideration of the instant application. In the event the instant application can be placed in even better form, Applicants request that the undersigned attorney be contacted at the number below.

Respectfully submitted,

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